

**REMARKS**

Applicant thanks the Examiner for considering the references cited with the Information Disclosure Statement filed July 11, 2002.

Applicant respectfully requests that the Examiner acknowledge: (1) the claim for priority under 35 U.S.C. § 119; and (2) receipt of a certified copy of the priority document, which was submitted on January 16, 2002.

**Status of the Application**

Claims 1-19 are all the claims pending in the Application, as claims 14-19 are hereby added to more fully define the current invention. Claims 1-13 have been rejected.

**Specification / Claim Objections**

The Examiner has objected to the specification and to claims 1-13 due to alleged informalities. Applicant respectfully submits that the terms "earth" and "ground" are equivalently used in the instant Application, as noted on page 10, line 9. Nevertheless, to improve the readability of the Application, Applicant hereby amends the pending claims to recite "ground" rather than "earth." Applicant respectfully submits that this amendment, by its very nature, is non-limiting, as both "earth" and "ground" have the very same meaning in this Application. With respect to the remaining portions of the Application, Applicant includes herewith a Substitute Specification which replaces "earth" with "ground" in the Specification, Title and Abstract. No new matter is added. Thus, withdrawal of this objection is requested.

**Claim Rejections**

The Examiner has rejected claims 1-6, 8-11 and 13 under 35 U.S.C. § 102(e) as being anticipated by Hirzmann (US 6,535,394 B1; hereinafter “Hirzmann”), and claims 7 and 12 under 35 U.S.C. § 103(a) as being unpatentable over Hirzmann. These rejections are respectfully traversed.

Hirzmann discloses an attachment structure wherein fixing posts 300 (see FIGS. 2-4) connect conducting region 210 of motherboard 100 to casing 110. The fixing posts 300 are screwed (or otherwise fixed) into casing 110, (col. 3, lines 8-10) and are attached to motherboard 100 by way of circumferential slot 310 which fits into keyhole shaped fixing hole 200. “In order to provide a tight mechanical fit between the underside of motherboard 100 and fixing post 300, a resilient metallic split washer 320 is provided that clips into slot 310.” (Col. 3, lines 12-15).

Regarding independent claim 1, the Examiner takes the position that the recited “substrate,” “compensating member” and “ground connecting member” correspond to motherboard 100, casing 110, and a combination of fixing post 300, slot 310 and split washer 320, respectively.

In contrast, Applicant respectfully submits that Hirzmann fails to teach or suggest that the “ground connecting member extends from said substrate toward said compensating member to resiliently contact said compensating member,” as recited in claim 1. Specifically, the only portion of Hirzmann that *could* provide resilient contact is split washer 320. However, split washer 320 is arranged to resiliently contact motherboard 100, which is equated to the recited

“substrate” by the Examiner. There is simply no resilient contact between any of the portions 300, 310 or 320 and casing 110, which is equated to the recited “compensating member” by the Examiner.

Regarding independent claim 8, the Examiner takes the position that the recited “base” and “spacer” of the “ground connecting member”<sup>1</sup> correspond to fixing post 300 and split washer 320, respectively.

In contrast, Applicant respectfully submits that Hirzmann fails to teach or suggest that the “spacer is in contact with said compensating member,” as recited in claim 8. Specifically (see FIG. 3), split washer 320 is only in contact with fixing post 300 (equated to the recited “base” by the Examiner) and motherboard 100, which is equated to the recited “substrate” by the Examiner. Split washer 320 is simply not “in contact” with any portion of Hirzmann that could be considered to be equivalent to the recited “compensating member” (equated to casing 110 by the Examiner).

Regarding independent claim 13, the Examiner takes the position that the recited “substrate,” “compensating member” and “ground connecting member” correspond to motherboard 100, casing 110, and a combination of fixing post 300, slot 310 and split washer 320, respectively.

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<sup>1</sup> Equated above to a combination of fixing post 300, slot 310 and split washer 320.

In contrast, Applicant respectfully submits that Hirzmann fails to teach or suggest arranging a compensating member such that the “ground connecting member extends from said substrate toward said compensating member to resiliently contact said compensating member,” as recited in claim 13, for *at least* the reasons discussed above with respect to claim 1.

Additionally, Applicant respectfully submits that claims 2-7 and 14-19, which are dependent from claim 1, and claims 9-12, which are dependent from claim 8, are allowable *at least* by virtue of their dependency.

Thus, Applicant respectfully requests that the Examiner withdraw this rejection.

#### **New Claims**

Claims 14-19 are hereby added to more fully define the invention. Claims 14-19 are fully supported *at least* by the Figures of the instant Application, and are respectfully submitted to be allowable *at least* by virtue of their dependency from claim 1.

#### **Conclusion**

In view of the foregoing, it is respectfully submitted that claims 1-19 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-19.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.111  
U.S. Appln. No.: 10/046,095

Attorney Docket # Q68077

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



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Date: July 17, 2003